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*Attorneys for Defendants
Saint Peter's Healthcare System,
Ronald C. Rak, Susan Ballestero,
and Garrick Stoldt*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LAURENCE KAPLAN, on behalf of	:	
himself, individually, and on behalf of all	:	Civil Action No. 13-2941 (MAS)(TJB)
others similarly situated,	:	
	:	Honorable Michael A. Shipp
Plaintiff,	:	United States District Judge
v.	:	
	:	Honorable Tonianne J. Bongiovanni
SAINT PETER'S HEALTHCARE	:	United States Magistrate Judge
SYSTEM, RONALD C. RAK, an	:	
individual, SUSAN BALLESTERO, an	:	NOTICE OF MOTION TO
individual, GARRICK STOLDT, an	:	<u>TO STAY THE PROCEEDINGS</u>
individual, and JOHN and JANE DOES,	:	
each an individual, 1-20,	:	
	:	(Electronically Filed Document)
Defendants.	:	

TO: Attorneys of Record

COUNSEL:

PLEASE TAKE NOTICE that on June 20, 2016 at 9:00 A.M. in the
forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys

for defendants Saint Peter's Healthcare System, Ronald C. Rak, Susan Ballestero, and Garrick Stoldt (collectively, the "Defendants"), shall apply before the Honorable Michael A. Shipp at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608 for an Order staying further proceedings in this action pending the determination of Defendants' petition for a writ of certiorari by the United States Supreme Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants shall rely upon the accompanying Memorandum of Law. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that Defendants hereby request oral argument.

Respectfully submitted,
SILLS CUMMIS & GROSS P.C.
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By: s/ Jeffrey J. Greenbaum
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Saint Peter's Healthcare System,
Ronald C. Rak, Susan Ballestero,
and Garrick Stoldt

Dated: April 27, 2016